

## REMARKS

## Claim Rejections – 35 U.S.C. § 103 Over Weissman And Veronese

The Office Action rejects claims 1, 3-5, 7, 9-11, 13, and 15-17 for obviousness under 35 U.S.C. § 103 as being unpatentable over a combination of Weissman, *et al.* (U.S. Patent No. 6,212,524) (hereafter, ‘Weissman’) in view of Veronese (U.S. Patent Publication No. 2004/0210445) (hereafter, ‘Veronese’). The question of whether Applicants’ claims are obvious or not is examined in light of: (1) the scope and content of the prior art; (2) the differences between the claimed invention and the prior art; (3) the level of ordinary skill in the art; and (4) any relevant secondary considerations, including commercial success, long felt but unsolved needs, and failure of others. *KSR Int’l Co. v. Teleflex Inc.*, No. 04-1350, slip op. at 2 (U.S. April 30, 2007). Although Applicants recognize that such an inquiry is an expansive and flexible one, the Office Action must nevertheless demonstrate a *prima facie* case of obviousness to reject Applicants’ claims for obviousness under 35 U.S.C. § 103(a). *In re Khan*, 441 F.3d 977, 985-86 (Fed. Cir. 2006). To establish a *prima facie* case of obviousness, the proposed combination of Weissman and Veronese must teach or suggest all of Applicants’ claim limitations. *Manual of Patent Examining Procedure* § 2142 (citing *In re Royka*, 490 F.2d 981, 985, 180 USPQ 580, 583 (CCPA 1974)). Independent claim 1 of the present application recites:

1. A method for populating a database, the method comprising:

providing a database having a schema, wherein the schema defines tables in a database as well as fields in each table, relationships between fields and tables, and dependencies among tables;

inferring from the schema dependencies among a fact table and related dimension tables, wherein a dependency comprises a rule for the database, enforced by a database management system, that a first record in a first table must exist in the database before a

second record in a second table may be inserted in the database, further comprising:

selecting from metadata describing a schema for the database expressions of dependencies; and

inserting the expressions of dependencies into a dependency list; and

inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimension tables.

As discussed in more detail below, the cited combination of references does not teach or suggest each and every element and limitation of Applicants' claims. The cited combination of references therefore cannot be used to establish a *prima facie* case of obviousness against the claims of the present application.

**Weissman Does Not Teach Or Suggest Inferring From The Schema Dependencies Among A Fact Table And Related Dimension Tables**

The Office Action at page 3, in response to Applicants previously submitted arguments, takes the position that Weismann at column 3, lines 1-2 and lines 36-38, column 5, lines 26-32, column 6, lines 1-46, column 7, lines 42-49, and column 10, lines 24-42 discloses "inferring from the schema dependencies among a fact table and related dimension tables..." as claimed in the present application. The Office Action specifically takes the position that Weismann's metadata describing a schema, and the use of Weismann's metadata in populating tables, discloses dependencies among a fact table and related dimension tables as claimed here. Whether Weismann discloses such dependencies among fact tables and dimension tables is irrelevant as applicants are claiming more than the mere existence of such dependencies among tables. Applicants instead claim the action or method step of inferring such dependencies from a schema.

Applicants' respectfully submit that Weismann's metadata, and the use of such metadata in populating tables, does not disclose the action or method step of inferring dependencies from a schema as claimed here. Instead, Weismann's metadata is described only as a description of a schema that is used to create a set of commands to create tables – nothing more. That is, Weismann only vaguely and generally discloses the use of metadata to create commands which, in turn, are used to create tables. Weismann stops there, disclosing nothing more with respect to the creation of commands or creation of tables using such commands. Weismann does not disclose or suggest *how* such commands used to create tables are created or *how* the metadata is even used to create such commands. That is, Weismann does not disclose the action or the method step of inferring dependencies from a schema as claimed here. Weismann never explicitly discloses, or even implicitly suggests, such action or method step because inferring dependencies from a schema as claimed here is carried out in part by selecting from the metadata expressions of such dependencies and Weismann never once even mentions such expressions of dependencies in metadata or selecting such expressions from metadata. Without disclosing more than a vague and general description of metadata used in 'creating commands used to create tables,' Weismann cannot and in fact does not disclose "inferring from the schema dependencies among a fact table and related dimension tables" as claimed here.

For similar reasons, Veronese also fails to disclose or suggest "inferring from the schema dependencies among a fact table and related dimension tables" as claimed here. In fact, Veronese does not disclose metadata describing a schema and as such cannot disclose inferring dependencies from a schema which is carried out by selecting, from such metadata describing the schema, expressions of dependencies as claimed in the present application. Instead, Veronese discloses metadata that defines business rules and the metadata is stored in a database. That is, Veronese's metadata does not describe a schema but describes business rules and is implemented as data in a database. Although several of these words describing Veronese's metadata are similar to words used in Applicants' original specification and claims - possibly being the reason the Veronese

reference appeared in Examiner's prior art search for this application - Veronese's use of the words differs greatly from Applicants use in describing the novel aspects of Applicants' invention.

Because neither Weissman nor Veronese, either alone or in combination, disclose or suggest inferring from the schema dependencies among a fact table and related dimension tables as claimed in the present application, the proposed combination of Weissman and Veronese does not disclose or suggest each and every element and limitation of Applicants' claims. Because the proposed combination does not disclose or suggest each and every element and limitation of Applicants' claims, the proposed combination cannot be used to establish a *prima facie* case of obviousness against Applicants' claims within the meaning of 35 U.S.C. § 103. The rejections under 35 U.S.C. § 103 should therefore be withdrawn.

#### **Relations Among Claims**

Independent claim 1 claims method aspects for populating a database according to embodiments of the present invention. Independent claims 7 and 13 respectively claim system and computer program product aspects for populating a database according to embodiments of the present invention. Claim 1 is allowable for the reasons set forth above. Claims 7 and 13 are allowable because claim 1 is allowable. The rejections of claims 7 and 13 therefore should be withdrawn, and claims 7 and 13 should be allowed.

Claims 3-5, 9-11, and 15-17 depend respectively from independent claims 1, 7, and 13. Each dependent claim includes all of the limitations of the independent claim from which it depends. Because the combination of Weissman and Veronese does not teach or suggest each and every element of the independent claims, the combination of Weissman and Veronese also does not teach or suggest each and every element of the dependent claims of the present application. As such, claims 3-5, 9-11, and 15-17 are also patentable and should be allowed.

The Commissioner is hereby authorized to charge or credit Deposit Account No. 09-0447 for any fees required or overpaid.

Respectfully submitted,

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By:



Brandon C. Kennedy  
Reg. No. 61,471  
Biggers & Ohanian, LLP  
P.O. Box 1469  
Austin, Texas 78767-1469  
Tel. (512) 472-9881  
Fax (512) 472-9887  
ATTORNEY FOR APPLICANTS